

Mr. Walter Mugdan, Director
Emergency and Remedial Response Division
USEPA- Region 2
290 Broadway, 19th Floor
New York, NY 10007-1866

December 19, 2016

Dear Director Mugdan,

As the authorized representatives for the coalition of groups including Ringwood C.A.R.E.S, the nonprofit Edison Wetlands Association, and the NJ Sierra Club, who represent thousands of residents throughout New Jersey and beyond, we are writing to the USEPA to raise several concerns that must be fully addressed prior to any work beginning on the Ringwood Mines Superfund Site, Ringwood, NJ. Specifically, we have serious concerns regarding the proposed remedial work for the O'Connor Disposal Area (OCDA). The current proposal of constructing a recycling center atop the OCDA presents several critical health and safety issues that must be fully addressed by the USEPA before any work begins on the site or its surrounding areas.

The area of the Ringwood Mines Superfund Site, including the OCDA is seismically unstable and contains numerous sinkholes as well as an undetermined amount of underground mineshafts. This exacerbates the already inherent dangerous work at the OCDA, Peter's Mine, and the Cannon Mine Pit. Several sinkholes have opened up already, the most recent being late last month on Van Dunk Lane. The USEPA's own well drillers experienced an unexplainable event during the installation of wells in early April 2016 when EPA's contractors' well rig unexpectedly dropped because of a void in the bedrock of unknown origin. Due to these extremely dangerous conditions that exist along the entire 500+ acre Ringwood Mines Superfund Site, the USEPA and Ford must proceed with the utmost consideration for the safety of the residents who live on top of this Superfund site, as well as for the safety of the workers, contractors, and state and federal regulators who will perform and oversee the project.

Our groups and the thousands of members they represent are hereby officially requesting, in the interest of public safety and to avoid potential seismic disturbances by the proposed work, the following actions be taken prior to any finalization of plans, mobilization onsite, or commencement of work:

1. The USEPA must conduct a demonstration project on the feasibility of the proposed work on the O'Connor Disposal Area. This demonstration project request is based on the USEPA's **"Abandoned Mine Site Characterization and Cleanup Handbook"** (Chapter 5, Section 2), published August 2000. This handbook states that the USEPA must consider **"Community Values and Culture"** to "Conduct a Demonstration Project. The team should consider a demonstration project in cases where the EPA is proposing soil remediation."

Considering the fact that significant compaction of the OCDA will be done as part of the site preparation and capping, it is the responsibility of the USEPA, Army Corps of Engineers, and NJ Geologic Service to look at the potential implications of this project and demonstrate that it can be done safely on a pilot scale before allowing a full-scale project to move forward.

We request that the USEPA confer with these other agencies to design a demonstration project that provides conditions that will occur during the compaction and other seismic work that must take place at the OCDA site.

2. We request that the USEPA provide a comprehensive draft Health and Safety Plan (HASP) for the site that accurately reflects the specific risks at this site. We demand that this HASP be drafted and distributed for public comment prior to any final approvals or mobilization for any remedial work at any of the Operable Units (OU) at the Ringwood Mines Superfund Site. This includes but is not limited to:
 - a) Secondary and tertiary emergency escape routes that take into consideration sinkholes and seismic subsidence.
 - b) Evacuation routes for the residents and families living on top of this site in case the worst should happen and roads and sidewalks are made impassable by mineshaft collapse or sinkholes.
 - c) A central command center down gradient from the Superfund site where emergency responders and other agencies can mobilize and treat any injured or displaced resident as a result of a sinkhole collapse or other seismic event.
 - d) Maps to the local hospital and all emergency contact numbers for first responders, police, fire department, ambulances, and mine rescue specialists that will have to be part of this HASP as it is a known hazard and must be fully vetted in the health and safety plan.

These requests are a baseline and should be the minimum conducted by the USEPA and other regulatory agencies, including the NJ Geologic Service. Included with the precautions outlined above, the agencies overseeing this cleanup should install a series of seismographs throughout the areas where known seismic activity has occurred in the past. The groups and the community at large are still waiting for a realistic explanation for the well drilling failure that occurred on March 18, 2016. We support the reformation of the Community Advisory Group with Dr. Peter deFur as the technical advisor; the CAG being only trusted forum by the community for the dissemination of site-related information. We would like a response to the above requests in writing no later than January 1, 2017.

Respectfully,

Lisa Chiang, Spokesperson
Ringwood C.A.R.E.S

Robert Spiegel, Executive Director
Edison Wetlands Association

Jeff Tittel, Chapter Director
New Jersey Sierra Club

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